

THE PARACLETE LAW CENTER, LLC**ATTORNEYS. ADVOCATES. COUNSELORS AT LAW.**

"Far more than just transactional, we focus on building relationships"

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December 4, 2020

FILED ELECTRONICALLY

The Honorable Jocelyn G. Boyd
Chief Clerk
South Carolina Public Service Commission
PO Drawer 11649
Columbia SC 29211

RE: Application of Carolina Procurement Institute, LLC for a Class E (Household Goods) Certificate of Public Convenience and Necessity
Docket No.: 2020-234-T

Dear Ms. Boyd:

On behalf of the Applicant, and pursuant to Commission Rule 103-834, I request that the Commission grant Applicant leave to take the deposition of a witness (or witnesses) chosen by the Applicant at a time and place to be agreed upon by the parties in the above-referenced Docket. Any such witness(es) will testify as the Applicant's shipper witness(es), and do so via deposition and in lieu of an appearance at the hearing in this case. Allowing testimony via deposition will accommodate the schedule of any such witness. I have spoken to counsel for the South Carolina Office of Regulatory Staff ("ORS") regarding this request, and the ORS does not object. The facts that Applicant seeks to establish by deposition are those that support Applicant's application in this Docket: that there is demand for household goods moving services that is not current being met. The deposition(s) will take place at a time mutually agreed upon by the parties, via telephone or otherwise, at the offices of The Paraclete Law Center, LLC, 1803 Hampton Street, Columbia, South Carolina 29201.

With kind regards, I am

Yours truly,

s/ Kharimah R. Dessow
Kharimah R. Dessow

cc: Jenny Pittman, Esq. (via electronic mail service) Mr. Gary Washington (via electronic mail service)

Kharimah Roacher Dessow-Attorney at Law

"par-a-clete: (1) a legal advocate, or counsel for defense, (2) an intercessor, (3) a helper"